

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEANDRE CRAWFORD,)	
)	
Plaintiff,)	
)	No: 1:18-cv-04882
v.)	
)	Hon. Mary M. Rowland
CHARLES BEST, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY

Plaintiff and Defendants (collectively, the “Parties”), by and through their respective counsel, jointly request that fact discovery be extended to April 2, 2021 to enable the Parties to resolve certain outstanding discovery issues. Together, the Parties state the following:

1. This case involves prisoner Deandre Crawford’s 42 U.S.C. § 1983 allegations that several Illinois Department of Corrections (“IDOC”) officers and staff failed to fix his faucet; failed to provide him a mattress; and retaliated against him by filing disciplinary charges against him. (ECF #5.)

2. On December 21, 2020, this Court granted the Parties’ stipulated motion to extend fact discovery to January 29, 2021. (ECF #109.)

3. Despite the Parties’ efforts, the following discovery issues remain outstanding:

- a. A subpoena served on non-party IDOC;
- b. Three depositions (two fact witnesses and one 30(b)(6) deposition);

c. Certain interrogatories and document requests served by Defendants.

4. The Parties have not sat idle with respect to discovery. Since the December 21, 2020, order, the Parties have completed a deposition, scheduled the two outstanding fact witnesses' depositions for February 11, 2021, and conferred on the outstanding written discovery. Both sides believe the outstanding discovery can be resolved without Court intervention given additional time.

5. Therefore, the Parties respectfully request that the Court modify the scheduling order to afford the Parties an additional sixty days to ensure the remaining depositions are completed and the outstanding written discovery is resolved. The current scheduling order and the proposed revised scheduling order is set forth below:

	Current Deadline	Proposed Deadline
Close of Fact Discovery	January 29, 2021	April 2, 2021
Plaintiff's Expert Disclosures	February 19, 2021	April 20, 2021
Deadline for Deposing Plaintiff's Experts	March 19, 2021	May 18, 2021
Defendants' Expert Disclosures Due	April 2, 2021	June 1, 2021
Deadline for Deposing Defendants' Experts	April 30, 2021	June 29, 2021
Plaintiff's Rebuttal Expert Disclosures Due	May 14, 2021	July 13, 2021
Expert Discovery to Close and Deadline for Completing Expert Depositions	May 28, 2021	July 27, 2021
Deadline for Filing Dispositive Motions	June 28, 2021	August 27, 2021
Deadline for Filing Responses to Dispositive Motions	July 28, 2021	September 27, 2021
Deadline for Filing Replies in Support of Dispositive	August 11, 2021	October 11, 2021

Motions		
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6. In the event that the Parties are unable to complete the outstanding discovery within sixty days, they will raise the issue with the Court via an appropriate motion to compel or motion for a protective order before the close of fact discovery.

WHEREFORE, the parties respectfully request that the Court extend the fact discovery cut-off date to April 2, 2021 and modify the case schedule as set forth above.

Dated: February 1, 2021

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Respectfully submitted by,

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